

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

Andre Jason Watts,

Plaintiff, Pro Se,

v.

CBRE Group, Inc.,

Defendant.

Civil Action No.: 3:25-cv-04483-RK-JBD

AMENDED COMPLAINT

I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question), as this case involves alleged violations of the First and Fourteenth Amendments of the U.S. Constitution, and the Computer Fraud and Abuse Act (18 U.S.C. § 1030), along with supporting federal doctrines related to whistleblower protection and intellectual property suppression.

2. Venue is proper under 28 U.S.C. § 1391(b), as the events giving rise to this action occurred in the District of New Jersey, and the Defendant conducts significant operations within this District.

II. PARTIES

3. Plaintiff, Andre Jason Watts, is a natural person residing in North Brunswick, New Jersey. He is the

inventor of WattsProtect(TM), an AI-powered calibration and compliance monitoring platform.

4. Defendant, CBRE Group, Inc., is a multinational corporation that operates facilities management services, including for pharmaceutical and federally regulated clients.

III. FACTUAL BACKGROUND

5. Plaintiff was employed by CBRE as a calibration technician at a pharmaceutical site operated in partnership with BeiGene USA, Inc. During his employment, Plaintiff developed an AI calibration safety system known as WattsProtect(TM) and later disclosed it to CBRE leadership.

6. On or about May 5, 2025, Plaintiff sent a private Notice of Invention/NDA to CBRE disclosing the technology, which was immediately followed by workplace retaliation. Plaintiff was placed on leave without cause, later terminated without explanation, and denied access to critical intellectual property evidence stored on a CBRE-issued ThinkPad.

7. Plaintiff filed a federal lawsuit, served the NDA, and subsequently submitted multiple motions including to preserve evidence and request injunctive relief.

IV. CAUSES OF ACTION

Count 1 - Retaliation in Violation of the First Amendment

8. Plaintiff engaged in protected speech concerning public safety and industrial innovation. Defendant retaliated by suspending and later terminating Plaintiff without cause.

Count 2 - Deprivation of Due Process (Fourteenth Amendment)

9. Plaintiff's termination and denial of intellectual property rights violated his constitutionally protected liberty interest as the sole provider of a minor child and creator of life-saving technology.

Count 3 - Unlawful Withholding of Property

10. Defendant's continued possession of the ThinkPad containing Plaintiff's work, invention logs, and communications constitutes unlawful deprivation of personal and proprietary material.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. That the Court reopen this civil action;
- B. That Plaintiff be granted leave to proceed in forma pauperis;
- C. That Defendant be enjoined from destroying or modifying evidence, including the ThinkPad;
- D. That Plaintiff be awarded damages in an amount to be determined at trial;
- E. That the Court grant such further relief as it deems just and proper.

Respectfully submitted,

Andre Jason Watts

Plaintiff, Pro Se

Dated: May 22, 2025

A handwritten signature in black ink, appearing to read "Andre Jason Watts". The signature is fluid and cursive, with a large initial "A" and a stylized "W".